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VIA ECF & E-MAIL (CronanNYSDChambers@nysd.uscourts.gov)

Hon. John P. Cronan, U.S.D.J.
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Valentini v. Group Health Incorporated, et al., No. 1:20-cv-09526

Your Honor:

This firm, along with co-counsel Post & Post LLC, represent Defendants, CareCore National LLC d/b/a eviCore (“eviCore”), the entity named in the Complaint as Group Health Incorporated now formally EmblemHealth Plan, Inc. (hereinafter for the avoidance of confusion “GHI”) and Emblem Health, Inc. (“Emblem”) (collectively “Defendants”), in the above action. As Your Honor is aware, eviCore and GHI are each entitled to file a 10-page reply memorandum of law in further support of their respective Motions to Dismiss. We write to respectfully request leave to file a single, 17-page reply memorandum of law in response to the single, 40-page opposition memorandum of law filed by Plaintiffs. Plaintiffs have consented to this request. Should this request meet with the Court’s approval we ask that the Court “So Order” this letter and grant the relief requested herein.

We thank Your Honor for your kind consideration of this matter. Please do not hesitate to have the Court’s staff contact us if anything further is required or we may be of any service to the Court whatsoever.

Respectfully submitted,

s/ E. Evans Wohlforth, Jr.

E. Evans Wohlforth, Jr.

cc: Steve Cohen, Esq. (via ECF and email)
Jordan K. Merson, Esq. (via ECF and email)